

Exhibit C

RE: TIME SENSITIVE - DEPOSITION SCHEDULING - BARBOUNIS V. MEF

Benson, Leigh Ann <LBenson@cozen.com>

Fri 10/16/2020 4:20 PM

To: Seth Carson <seth@dereksmithlaw.com>; Walton, David <DWalton@cozen.com>

Cc: Sidney Gold <sgold@discrimlaw.net>; Cavalier, Jonathan <JCavalier@cozen.com>

Dave and I are available at 5pm and I can circulate an invite.



<http://www.cozen.com/cozendocs/cozen-oconnor-logo.gif>

Leigh Ann Benson

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From: Seth Carson <seth@dereksmithlaw.com>

Sent: Friday, October 16, 2020 3:34 PM

To: Walton, David <DWalton@cozen.com>

Cc: Sidney Gold <sgold@discrimlaw.net>; Benson, Leigh Ann <LBenson@cozen.com>; Cavalier, Jonathan <JCavalier@cozen.com>

Subject: Re: TIME SENSITIVE - DEPOSITION SCHEDULING - BARBOUNIS V. MEF

****EXTERNAL SENDER****

I am still in this deposition.

Leigh Ann and Jon, are you going to be availble today to talk?

Seth D. Carson, Esquire
Derek Smith Law Group, PLLC
1835 Market Street
Suite 2950
Philadelphia, PA 19103
Phone: 215.391.4790
Facsimile: 215.893.5288
Direct: 484.678.2210
Email: Seth@DerekSmithLaw.com

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From: Walton, David <DWalton@cozen.com>
Sent: Friday, October 16, 2020 1:28 PM
To: Seth Carson <seth@dereksmithlaw.com>
Cc: Sidney Gold <sgold@discrimlaw.net>; Benson, Leigh Ann <LBenson@cozen.com>; Cavalier, Jonathan <JCavalier@cozen.com>
Subject: Re: TIME SENSITIVE - DEPOSITION SCHEDULING - BARBOUNIS V. MEF

I have a call from 4-5. If Leigh Ann is available, she can handle the call for us. Jon too.

Dave Walton
Sent from my iPhone

On Oct 16, 2020, at 1:26 PM, Seth Carson <seth@dereksmithlaw.com> wrote:

****EXTERNAL SENDER****

Dave and Leighann,

Can you please let us know your availability for a call today? I am going to help you guys get your deps done too. I think all of us should look at this like a good thing. We do 2 weeks of deps and then we are done fact discovery.

I am in a deposition right now but I can talk this afternoon at 4:00 P.M., if that works for everyone else?

Seth D. Carson, Esquire
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From: Sidney Gold <sgold@discrimlaw.net>
Sent: Friday, October 16, 2020 1:24 PM

To: Seth Carson <seth@dereksmithlaw.com>

Cc: Walton, David <DWalton@cozen.com>; Benson, Leigh Ann <LBenson@cozen.com>

Subject: Re: TIME SENSITIVE - DEPOSITION SCHEDULING - BARBOUNIS V. MEF

I am available for a phone conference

Sent from my iPhone

On Oct 16, 2020, at 1:16 PM, Seth Carson <seth@dereksmithlaw.com> wrote:

Dave,

Can we please get on the phone and set up dates for the depositions the following people:

1. Mark Fink
2. Daniel Pipes
3. Greg Roman
4. Matthew Bennett
5. Steve Levey
6. Laurence Hollin

I previously provided dates but I can do them anytime in the next couple weeks. I need 3 days for all of them.

Can you please let me know what 3 days we are going to use?

I suggest that we get on the phone and set aside dates for all depositions. I will help coordinate the scheduling of any depositions.

I apologize if I am wrong about this but I have sent you several emails about this and I have never heard back from Sidney Gold's office even once. His office has never contacted me to discuss scheduling. His office has never emailed me to provide and discuss dates.

Dave, you and I have discussed this and I believe we are in agreement. Since we are getting near the end of fact discovery, I think that me and you and Leighann should get on the phone and set aside all the dates.

All of our clients clearly have to make the time.

Mr. Gold, please let me know if you plan to discuss depositions.

I am going to send Judge Wolson a letter today and let him know that we need help with this because these depositions have to take place in the next 2 weeks, unless there is an extension of deadlines.

I am going to request that Judge Wolson issue an Order in connection with depositions. I will agree that any such order will apply to my clients as well. I

will produce anyone you need to depose anytime you would like to depose them, subject to my schedule.

Thank you.

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